



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY 142906

Mary A. Gade, Director
217 792-672

2200 Churchill Road, Springfield, IL 62794-9276

June 8, 1993

Mr. Bill Bolen
Remedial Project Manager
USEPA Region V HSSIL-6J
77 West Jackson Blvd.
Chicago, Illinois 60604

Re: 0971900047 Waukegan Coke Plant
POTW discharge request
Superfund/Tech Report

Dear Bill,

This letter is a summary of the IEPA's position regarding the discharge of pollution control water onsite. This letter was deemed necessary by myself after the conference call that was held yesterday morning between USEPA, IEPA, and Barr Environmental to put the last eight months of letters and meetings together on this issue.

This issue of discharging water back to the site after treatment was discussed in the States comments in the letter dated October 9, 1992 on the Phase I results and Phase II proposal. No onsite discharge of any treated or untreated effluent is allowed by the IEPA. The pollution control water was stated in that letter, to be containerized, analyzed and disposed of off site via a POTW or NPDES permit.

During the meeting held March 5, 1993 at USEPA the PRP's continued to petition for the onsite discharge of the treated water. I was in no position to allow this state requirement to be waived and stated that they could continue to propose this disposal alternative. They were also again told in the meeting that permits would be required for any off site discharge from the facility, either a NPDES or a POTW, and that they should begin the process of obtaining these appropriate permits .

Our comments dated May 20, 1993 on the revised Phase II RI again stated that their disposal alternative of direct discharge to the site was not allowed and that permits would be required for off site disposal.

In the conference call yesterday Jim Langseth of Barr continued to lobby for the state to allow the direct discharge of the treated effluent back to the site. Mr. Langseth stated that the permit for discharge off site would take several months and slow down the project, since they had not even contacted the North Shore Sanitary District at this point.

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The IEPA's position has been clear and consistent on this issue. It is the PRP's responsibility to meet all of the USEPA and IEPA requirements and maintain the schedule. Any variances from this schedule has not been the fault of the IEPA.

If you have any questions please call Jerry Willman or myself.

Sincerely,

**T.B. Fitzgerald, Project Manager/Engineer
Federal Sites Management Unit
Remedial Project Management Section
Division of Remediation Management
Bureau of Land**